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## *Department of Banking and Finance*

*2990 Brandywine Road, Suite 200*

*Atlanta, Georgia 30341-5565*

*Sonny Perdue*  
*Governor*

*770-986-1633*

*[www.gadbf.org](http://www.gadbf.org)*

*Robert M. Braswell*  
*Commissioner*

June 13, 2008

**VIA CERTIFIED MAIL 7005 1820 0006 4359 0552**

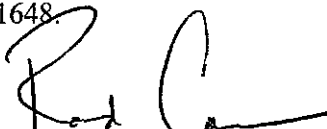
Andrew Santoli  
c/o Tammy A. Bouchelle, Esq.  
Schiff Hardin, LLP  
One Atlantic Center  
1201 West Peachtree Street, Suite 2300  
Atlanta, Georgia 30309

### **ORDER TO CEASE AND DESIST**

Pursuant to O.C.G.A. § 7-1-1018(a), the Georgia Department of Banking and Finance ("Department") hereby orders you, Andrew Santoli, to cease and desist from engaging in activities in violation of the Georgia Residential Mortgage Act ("GRMA"), O.C.G.A. § 7-1-1000 *et seq.* Specifically, the Department has evidence that in your capacity as president of North American Real Estate Services d/b/a Pacific Bancorp, you purposefully withheld, deleted, destroyed or altered information requested by an examiner and made false statements to the Department in violation of O.C.G.A. § 7-1-1013(11); engaged in net branching in violation of Department Rule 80-11-1-.03(4) and (5); and transacted business in violation of O.C.G.A. § 7-1-1002(a) and (b) with persons who are unlicensed and unregistered, not exempt from licensing and registrations requirements and who are not employees of a mortgage broker or lender. Further, in violation of O.C.G.A. § 7-1-1002(c), you directly or indirectly controlled persons who violated O.C.G.A. § 7-1-1002(a) and (b).

Pursuant to the provisions of O.C.G.A. § 7-1-1018, you may request a hearing to contest this Order. This hearing, at which the Department will present its evidence and be represented by the Office of the Attorney General, will be before a judge of the Office of State Administrative Hearings. You may retain counsel of your choice. You may subpoena witnesses and documentary evidence.

The request for a hearing must be made in writing within 20 days of the date of this Order. Please be advised that if you do not request a hearing in writing within 20 days of the date of this Order, this Order shall become a final order. As a result, a licensed mortgage broker or mortgage lender will be prohibited from employing you for a period of 5 years to perform any functions governed by the GRMA. O.C.G.A. § 7-1-1004. This restriction in no way prohibits you from engaging in business with a mortgage broker or mortgage lender that is not licensed or required to be licensed by this Department. Should you have any questions concerning this matter, please contact Helen O'Leary, Non-Depository Financial Institutions Division Attorney, at (770) 986-1648.

  
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Rod Carnes, CFE  
Deputy Commissioner  
Non-Depository Financial Institutions Division